

MICHAEL W. BIEN – 096891  
 ERNEST GALVAN – 196065  
 KARA J. JANSSEN – 274762  
 GINGER JACKSON-GLEICH – 324454  
 ROSEN BIEN  
 GALVAN & GRUNFELD LLP  
 101 Mission Street, Sixth Floor  
 San Francisco, California 94105-1738  
 Telephone: (415) 433-6830  
 Email: mbien@rbgg.com  
 egalvan@rbgg.com  
 kjanssen@rbgg.com  
 gjackson-gleich@rbgg.com

OREN NIMNI\*  
 Mass. Bar No. 691821  
 AMARIS MONTES\*  
 Md. Bar No. 2112150205  
 RIGHTS BEHIND BARS  
 416 Florida Avenue N.W. #26152  
 Washington, D.C. 20001-0506  
 Telephone: (202) 455-4399  
 Email: oren@rightsbehindbars.org  
 amaris@rightsbehindbars.org  
 d@rightsbehindbars.org

\* Admitted *pro hac vice*

SUSAN M. BEATY – 324048  
 CALIFORNIA COLLABORATIVE FOR  
 IMMIGRANT JUSTICE  
 1999 Harrison Street, Suite 1800  
 Oakland, California 94612-4700  
 Telephone: (510) 679-3674  
 Email: susan@ccijjustice.org

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN  
 PRISONERS, et al.,  
 Plaintiffs,  
 v.  
 UNITED STATES OF AMERICA FEDERAL  
 BUREAU OF PRISONS, et al.,  
 Defendants.

Case No. 4:23-cv-04155-YGR

**REPLY DECLARATION OF  
 AMARIS MONTES IN SUPPORT  
 OF PLAINTIFFS' MOTION FOR  
 PRELIMINARY INJUNCTION**

Date: December 11, 2023  
 Time: 1 p.m.

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: None Set

1 I, Amaris Montes, declare:

2 1. I am an attorney admitted to practice before this Court pro hac vice. I am the  
3 Director of West Coast Litigation and Advocacy at the organization Rights Behind Bars,  
4 and counsel of record for the Plaintiffs and Proposed Class. I have personal knowledge of  
5 the facts set forth herein, and if called as a witness I could competently so testify. I make  
6 this reply declaration in support of Plaintiffs' motion for preliminary injunction.

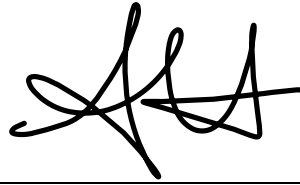
7 2. Plaintiffs moved for a preliminary injunction on August 17, 2023 to prevent  
8 imminent and irreparable harm caused by the Bureau of Prisons' (BOP) inaction in the  
9 face of a pattern of sexual attacks by staff on incarcerated women. ECF No. 10. The  
10 preliminary injunction also addressed the imminent and irreparable harm caused by  
11 retaliation against incarcerated women who complain about sexual misconduct. *See* ECF  
12 No. 10 at 17-19.<sup>1</sup>

13 3. Attached to Plaintiffs' Reply to Defendants Opposition to Plaintiffs' Motion  
14 for Preliminary Injunction is **Exhibit E**. Exhibit E is a non-exhaustive list of incidents of  
15 sexual assault or sexual harassment, retaliation, difficulties reporting abuse, inadequate  
16 mental and medical hair care, and denial of access to mail, phone calls, and legal visits  
17 between January 2022-August 2023 (the time of filing).

18 4. Exhibit E is a spreadsheet that was prepared by me by compiling information  
19 from the 47 declarations previously filed with Plaintiffs Preliminary Injunction. ECF No.  
20 10 (Exhibits). No new information was included that did not exist in those declarations.  
21 This is an organizational tool intended to assist the Court in its consideration.

22 I declare under penalty of perjury under the laws of the State of California that the  
23 foregoing is true and correct, and that this declaration is executed in Washington D.C. this  
24 24 day of November, 2023.

25  
26  
27  
28 <sup>1</sup> Page citations are to the ECF page numbering on the blue headers, not to internal document page numbering.



---

Amaris Montes

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28